

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

DOUGLAS W. BAILLE

Plaintiff,

V.

CHUBB &amp; SON INSURANCE

Defendant.

.....

Case No. C-1-02-062  
J. Spiegel

**PLAINTIFF'S UNOPPOSED MOTION  
FOR EXTENSION OF THE FILING  
DEADLINE FOR PLAINTIFF'S  
MEMORANDUM IN OPPOSITION TO  
DEFENDANT'S MOTION FOR  
SUMMARY JUDGMENT**

Comes now Plaintiff Doug Baillie, by and through counsel, and moves this Court to extend the filing deadline for Plaintiff's Memorandum in Opposition to Summary Judgment. Specifically, the Plaintiff seek an extension from the current deadline of October 9, 2003 to October 23, 2003. This is the first request for such an extension of time and is posed to permit Plaintiff to adequately respond to the numerous legal issues posed in support of summary judgment. Counsel for Defendant has been contacted and has indicated that he has no objection to the requested extension.

Respectfully submitted,

/s/Randolph H. Freking  
Randolph H. Freking (0009158)  
Mark W. Napier (0019700)  
Trial Attorneys for Plaintiff  
FREKING & BETZ  
215 East Ninth Street, Fifth Floor  
Cincinnati, OH 45202  
(513) 721-1975  
randy@frekingandbetz.com  
Mnapier@frekingandbetz.com

**CERTIFICATE OF SERVICE**

I hereby certify that on October 7, 2003, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system and copies will be mailed via U.S. mail to those parties who are not served via the Court's electronic filing system. Parties may access this filing through the Court's System.

/s/ Randolph H. Freking